

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION**

Matthew Madore and Mattie Madore,)	Case No. 9:22-cv-1974-BHH
)	(Formerly Case No.: 2022CP2700231)
)	
Plaintiffs,)	
)	
v.)	
)	
William C. Simmons; Federal Express)	NOTICE OF REMOVAL
Corporation; and Federal Express Freight)	
Inc.,)	
)	
Defendants.)	

3. Venue is proper in this matter in the Beaufort Division of this Court in accordance with 28 U.S.C. §1441(a).

4. Upon information and belief, the amount in controversy in this matter exceeds \$75,000.00 as Plaintiff alleges permanent injuries which required medical treatment and related expenses, and missed time at work resulting in lost wages.

5. Defendants have filed no pleadings in this action with the Court of Common Pleas for the State of South Carolina in response to this Complaint; however, Defendant's Answer to the Plaintiff's Complaint is filed herewith contemporaneously.

6. Defendants have furnished a copy of this Notice of Removal to the Clerk of Court for Jasper County.

Respectfully submitted,

SWEENEY, WINGATE & BARROW, P.A.

s/Mark S. Barrow

Mark S. Barrow; Fed. I.D. No. 1220
Aaron J. Hayes; Fed. I.D. No. 11196
Sweeny, Wingate & Barrow, P.A.
Post Office Box 12129
Columbia, SC 29211
(803) 256-2233

ATTORNEYS FOR THE DEFENDANTS

Columbia, South Carolina

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